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**DuPont Dow elastomers**

March 12, 1999

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Ms. Carol Browner, Administrator  
U.S. EPA  
P.O. Box 1473  
Merrifield, VA 22116

Attn: Chemical Right-to-Know Program

Dear Ms. Browner:

DuPont Dow Elastomers L.L.C ("Dupont Dow") recognizes and is committed to the EPA's Chemical Right to Know, HPV Challenge voluntary testing program. Seven chemicals are of interest to us but two chemicals on the list will be addressed in this letter. By separate letter we will address the other chemicals.

Two chemicals listed, **trans- and cis-1,4-Dichloro-2-butene** (CAS# 110576, and CAS # 1476115) should be delisted and instead listed as **non-separated 1,4-Dichloro-2-butene** (CAS # 764-41-0). We are the only U.S. producer of this mixture. The chemical is not separated in production and is site limited. The mixture would be considered one article if in commercial commerce. This mixture is manufactured globally by three other producers. If EPA agrees to the delisting request, DuPont Dow plans to work with these producers and organize a consortium through the International Institute of Synthetic Rubber Producers to test the non-separated mixture under the ICCA program.

If you have any questions, please contact Carol A. Palmiotto for this effort. She can be reached at (302)-792-4282, by fax (302) 792-4221 and by e-mail at [Carol.A.Palmiotto@usa.dupont.com](mailto:Carol.A.Palmiotto@usa.dupont.com).

Please advise us of your decision regarding delisting of the individual chemicals trans- and cis-1,4-Dichloro-2-butene and listing of the non-separated mixture.

Sincerely,

Carol A. Palmiotto  
Responsible Care Manager

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CC: C. Auer, EPA

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